

Honorable Robert S. Lasnik

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

JOB'S DAUGHTERS INTERNATIONAL,

Plaintiff,

v.

HEIDI YOAST,

Defendant; *and*

HEIDI YOAST,

Counterclaim Plaintiff,

v.

JOB'S DAUGHTERS INTERNATIONAL,  
ROD REID, an individual

Counterclaim Defendant

NO. 16-CV-01573-RSL

**DECLARATION OF ANGELA M.  
LEEPER IN SUPPORT OF  
COUNTERCLAIM PLAINTIFF'S  
OPPOSITION TO COUNTERCLAIM  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT**

I, Angela M. Leeper, hereby declare as follows:

1. I am over the age of 18, and I make this Declaration based on personal knowledge and am competent to testify as set forth herein.
2. I am a Majority Member, Past Honored Queen, Past Bethel Guardian, and Degree of

1 Royal Purple Recipient from the State of Nebraska.

2 3. On or about October 13, 2016 I became aware that Job's Daughters International had  
3 filed a law suit against Heidi Yoast via posts on Facebook.

4 4. Concerned and disturbed learning this, I reached out to Leslie Hoglund via Facebook  
5 Messenger to get her thoughts on the subject. A true and correct copy of that message exchange  
6 is attached hereto and incorporated herein as Exhibit A.

7 5. After the message exchange attached as Exhibit A, I had a long telephone conversation  
8 with Leslie Hogland.

9 6. During our phone conversation, Ms. Hoglund stated that she heard Shelly Cole  
10 announce at a meeting during Supreme Session 2016 in Grand Rapids, Michigan ("Supreme  
11 Session") that Job's Daughters International had been sending cease and desist letters to a  
12 certain Past Grand Bethel Honored Queen from Washington and that this person was  
13 unresponsive.

14 7. Ms. Hogland also stated that, after the larger meeting at Supreme Session, Ms. Hoglund  
15 and a few others from the Virginia jurisdiction approached Shelly Cole to ask her more detail  
16 about her comment regarding this person from Washington. Ms. Hoglund stated that in this  
17 exchange, Shelly Cole became very angry and pulled out her lap top and brought up Heidi  
18 Yoast's Facebook page to show photos of some of her work.

19 8. To the best of my knowledge, Heidi Yoast is the only Past Grand Bethel Honored  
20 Queen from Washington that maintains a custom graphic design and printing business that  
21 makes custom hoodies.

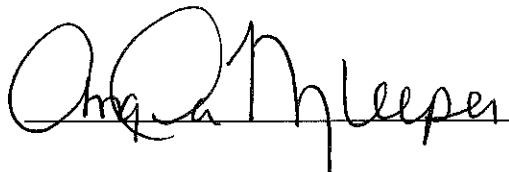
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1 9. I declare under penalty of perjury that the foregoing is true and correct to the best of my  
2 knowledge and belief.

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4 DATED this 6<sup>th</sup> day of March, 2018 at Omaha, Nebraska.

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7  Angela M. Leeper  
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**CERTIFICATE OF SERVICE**

The undersigned declares and states as follows:

I am a citizen of the United States, over the age of 18 years, not a party to the above-referenced matter, and am competent to be a witness.

On March 26 2018, I electronically filed the following document(s):

**DECLARATION OF ANGELA M. LEEPER IN SUPPORT OF  
COUNTERCLAIM PLAINTIFF'S OPPOSITION TO COUNTERCLAIM  
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all associated counsel of record.

I also served said documents in the manner set forth below on the following parties:

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*Attorneys for Plaintiff*

- ☐ *Via U.S. Mail*  
☐ *Via Facsimile Transmission*  
☒ *Via Email by USDC Western  
District EM/ECF Filing System*  
☐ *Via Hand-Delivery*

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☐ *Via Facsimile Transmission*  
☒ *Via Email by USDC Western  
District EM/ECF Filing System*  
☐ *Via Hand-Delivery*

*Attorneys for Plaintiff Job's Daughters International*

I declare under penalty of perjury according to the laws of the State of Washington that the above statements are true and correct.

SIGNED at Burbank, California this 26 day of March, 2018.

/s/ Patricia Forman  
Printed name: Patricia Forman